UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on December 6, 2019

UNITED STATES OF AMERICA) CRIMINAL NO.
)) <u>UNDER SEAL</u>
ν.) 21 U.S.C. §§ 1904, 1906) (Engaging in Transactions) or Dealings in Properties of
JESSICA JOHANNA OSEGUERA GONZALEZ, also known as "Jessica Johanna) a Designated Foreign) Person)
Castillo" and "La Negra")) 21 U.S.C. §§ 853, 970
Defendant.) (Criminal Forfeiture))

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Beginning on or about September 17, 2015, and continuing to the present day, in the United States, Mexico, and elsewhere, the defendant, JESSICA JOHANNA OSEGUERA GONZALEZ, (1) engaged in transactions or dealings in property or interests in property of a foreign person, J&P Advertising, S.A. de C.V. (also known as J and P Advertising, S.A. de C.V.), designated for materially assisting in, or providing support for or to, or providing goods or services in support of, the international narcotics trafficking activities of the narcotics trafficking organization known as the Cartel de Jalisco Nueva Generacion, and/or being controlled or directed by, or acting for or on behalf of, Cartel de Jalisco Nueva Generacion, under Title 21, United States Code, Sections

1904(b)(2), 1904(b)(3); and/or (2) engaged in transactions or dealings to evade or avoid, or that had the effect of evading or avoiding, the prohibition on transactions or dealings in property or interests in property of said foreign person. The Defendant's transactions or dealings violate Title 21, United States Code, Sections 1904(c)(1), 1904(c)(2) and 1906(a).

(Engaging in Transactions or Dealings in Properties of a Designated Foreign Person, in violation of Title 21, United States Code, Sections 1904 and 1906)

COUNT TWO

Beginning on or about September 17, 2015, and continuing to February 11, 2016, in the United States, Mexico, and elsewhere, the defendant, JESSICA JOHANNA OSEGUERA GONZALEZ, (1) engaged in transactions or dealings in property or interests in property of a foreign person, JJGON S.P.R de R.L. de C.V., designated for materially assisting in, or providing support for or to, or providing goods or services in support of, the international narcotics trafficking activities of the narcotics trafficking organization known as the Cartel de Jalisco Nueva Generacion, and/or being controlled or directed by, or acting for or on behalf of, Cartel de Jalisco Nueva Generacion, under Title 21, United States Code, Sections 1904(b)(2), 1904(b)(3); and/or (2) engaged in transactions or dealings to evade or avoid, or that had the effect of evading or avoiding, the prohibition on transactions or dealings in property or interests in property of said foreign person. The Defendant's transactions or dealings violate Title 21, United States Code, Sections 1904(c)(1), 1904(c)(2) and 1906(a).

(Engaging in Transactions or Dealings in Properties of a Designated Foreign Person, in violation of Title 21, United States Code, Sections 1904 and 1906)

COUNT THREE

Beginning on or about September 17, 2015, and continuing to the present date, in the United States, Mexico, and elsewhere, the defendant, JESSICA JOHANNA OSEGUERA GONZALEZ, (1) engaged in transactions or dealings in property or interests in property of a

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foreign person, Las Flores Cabanas (also known as Cabanas Las Flores), designated for materially assisting in, or providing support for or to, or providing goods or services in support of, the international narcotics trafficking activities of the narcotics trafficking organization known as the Cartel de Jalisco Nueva Generacion, and/or being controlled or directed by, or acting for or on behalf of, Cartel de Jalisco Nueva Generacion, under Title 21, United States Code, Sections 1904(b)(2), 1904(b)(3); and/or (2) engaged in transactions or dealings to evade or avoid, or that had the effect of evading or avoiding, the prohibition on transactions or dealings in property or interests in property of said foreign person. The Defendant's transactions or dealings violate Title 21, United States Code, Sections 1904(c)(1), 1904(c)(2) and 1906(a).

(Engaging in Transactions or Dealings in Properties of a Designated Foreign Person, in violation of Title 21, United States Code, Sections 1904 and 1906)

COUNT FOUR

Beginning on or about September 17, 2015, and continuing to the present date, in the United States, Mexico, and elsewhere, the defendant, JESSICA JOHANNA OSEGUERA GONZALEZ, (1) engaged in transactions or dealings in property or interests in property of a foreign person, Mizu Sushi Lounge and Operadora Los Famosos, S.A. de C.V. (also known as Kenzo Sushi and Operadora Los Famosos, S.A.P.I. de C.V.), designated for materially assisting in, or providing support for or to, or providing goods or services in support of, the international narcotics trafficking activities of the narcotics trafficking organization known as the Cartel de Jalisco Nueva Generacion, and/or being controlled or directed by, or acting for or on behalf of, Cartel de Jalisco Nueva Generacion, under Title 21, United States Code, Sections 1904(b)(2), 1904(b)(3); and/or (2) engaged in transactions or dealings to evade or avoid, or that had the effect of evading or avoiding, the prohibition on transactions or dealings in property or interests in

property of said foreign person. The Defendant's transactions or dealings violate Title 21, United States Code, Sections 1904(c)(1), 1904(c)(2) and 1906(a).

(Engaging in Transactions or Dealings in Properties of a Designated Foreign Person, in violation of Title 21, United States Code, Sections 1904 and 1906)

COUNT FIVE

Beginning on or about September 17, 2015, and continuing to the present date, in the United States, Mexico, and elsewhere, the defendant, JESSICA JOHANNA OSEGUERA GONZALEZ, (1) engaged in transactions or dealings in property or interests in property of a foreign person, Onze Black (also known as Tequila Onze Black), designated for materially assisting in, or providing support for or to, or providing goods or services in support of, the international narcotics trafficking activities of the narcotics trafficking organization known as the Cartel de Jalisco Nueva Generacion, and/or being controlled or directed by, or acting for or on behalf of, Cartel de Jalisco Nueva Generacion, under Title 21, United States Code, Sections 1904(b)(2), 1904(b)(3); and/or (2) engaged in transactions or dealings to evade or avoid, or that had the effect of evading or avoiding, the prohibition on transactions or dealings in property or interests in property of said foreign person. The Defendant's transactions or dealings violate Title 21, United States Code, Sections 1904(c)(1), 1904(c)(2) and 1906(a).

(Engaging in Transactions or Dealings in Properties of a Designated Foreign Person, in violation of Title 21, United States Code, Sections 1904 and 1906)

CRIMINAL FORFEITURE ALLEGATION

The United States hereby gives notice to the defendant that upon the conviction of the offense charged in this Information, the government will seek forfeiture in accordance with Title 21, United States Code, Sections 853 and 970, of all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the alleged Title 21 violation,

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and all property used or intended to be used in any manner or part to commit and to facilitate the commission of such offense.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Criminal Forfeiture, in violation of Title 21, United States Code, Sections 853 and 970)

A TRUE BILL:

Foreperson

MARLON COBAR Acting Chief Narcotic and Dangerous Drug Section Criminal Division U.S. Department of Justice Washington, D.C. 20530

By:

r: Anthony J. Nardozzi

Anthony J. Nardozzi Assistant Deputy Chief Narcotic and Dangerous Drug Section Criminal Division U.S. Department of Justice Washington, D.C. 20530